

REMARKS

Reconsideration and allowance of the subject matter are respectfully requested. Claims 1-20 are pending in this application. Applicants respectfully submit that the pending claims define patentable subject matter.

I. Specification Objection

The disclosure is objected to, as allegedly having informalities. By this Amendment, Applicant has re-presented the same Abstract on a separate page in accordance with the Examiner's instruction. Accordingly, the Examiner is requested to remove the objection.

II. Claim Objections

Claims 11 and 17 are objected to, as allegedly having informalities. By this Amendment, Applicant has amended claims 11 and 17 to improve clarity. Accordingly, the Examiner is requested to remove the objection.

III. Rejections under 35 U.S.C. § 101

Claims 1-4 and 6-10 are rejected under 35 U.S.C. § 101 as allegedly failing to meet the requirements of 35 U.S.C. § 101. Applicants respectfully disagree.

Applicants respectfully submit that the claims 1-4 and 6-10 constitute patentable subject matter under 35 U.S.C. § 101. For example, the specification represents many exemplary embodiments of what the claimed subject matter can be. In one example, a database is described as hardware device. See paragraph 0004, for example, which states: “information from the field devices and the controller is usually made available over a data highway to one or more other hardware devices, such as operator workstations, personal computers, data historians, report generators, centralized databases, etc.” (emphasis added). Here, the specification describes at least one instance of where a database is a hardware device. Thus, the database provides structure to interact with the software modules to provide a 35 U.S.C. § 101 statutory permissible system claim. In other words, the system claim is not completely software as alleged by the Examiner. Accordingly, the Examiner is requested to withdraw the rejections.

IV. Prior Art Rejections

Claims 1, 2, 4-8 and 17-20 are rejected under 35 U.S.C. § 102(b) as being anticipated by Eryurek et al. (U.S. Pat. Pub. 2002/0022894; hereinafter “Eryurek”). Claims 11-16 are rejected under 35 U.S.C. § 103(c) as being unpatentable over Eryurek and Blevins et al. (U.S. Pat. No. 6,445,963; hereinafter “Blevins”). Claim 3 is rejected under 35 U.S.C. § 103(c) as being unpatentable over Eryurek and Blevins. Claims 9 and 10 are rejected under 35 U.S.C. § 103(c) as being unpatentable over Eryurek and Spriggs et al. (U.S. Pat. Pub. 2003/0028269; hereinafter “Spriggs”). Applicants respectfully submit that the claimed invention would not have been anticipated by Eryurek or rendered obvious in view Eryurek, alone or in combination with Blevins and/or Spriggs.

Independent claim 1 is directed to “[a] configuration system for configuring a process control system of a process plant.” Independent claim 1 recites:

a configuration database to store a configuration of the process control system;

a process module stored in the configuration database, the process module comprising a plurality of process objects, each process object representing a corresponding physical entity in the process plant, the process module representing a logical unit in the process plant; and

a set of expert rules stored in the configuration database, the set of expert rules associated with the process module and adapted to be applied by an expert engine to detect at least one abnormal situation associated with the logical unit, the set of expert rules referencing information exposed by the process module.

The Examiner alleges that Eryurek discloses all of the features of independent claim

1. In particular, the Examiner points to Eryurek (Fig. 2, paragraphs 0045 to 0049) as allegedly disclosing a set of expert rules stored in the configuration database, the set of expert rules associated with the process module and adapted to be applied by an expert engine to detect at least one abnormal situation associated with the logical unit, the set of expert rules

referencing information exposed by the process module. For example, paragraph 0045 states in part: “the workstation 14 stores and executes communication software .. that communicates with the controllers.” However, there is no portion of Eryurek that teaches or suggests:

a set of expert rules stored in the configuration database, the set of expert rules associated with the process module and adapted to be applied by an expert engine to detect at least one abnormal situation associated with the logical unit, the set of expert rules referencing information exposed by the process module

as required by claim 1. (emphasis added). Rather, Eryurek merely discloses an embodiment for a workstation having an alarm display and interface system used in connection with the process control system shown in Fig. 1.¹ In fact, Eryurek does not mention an expert engine of any kind. Further, there is no such device capable of detecting at least one abnormal situation associated with the logical unit in connection with expert rules.

Similarly, Blevins does not teach or suggest these features of the claimed invention which are missing from Eryurek.

Accordingly, Applicants respectfully submit that independent claim 1, as well as dependent claims 2-10, should be allowable because the cited references do not teach or suggest all of the features of the claimed invention, and one of ordinary skill in the art would not have been motivated to combine and modify the cited references to produce the claimed invention.

Independent claims 11 and 17 recite features similar to those discussed above with regard to claim 1. In particular, claims 11 and 17 recites in part: a set of expert rules

¹ See paragraphs 0045-0045, discussing how the alarm system works and its various attributes.

associated with the process module and adapted to be applied by an expert engine to detect at least one abnormal situation associated with the logical unit.” Accordingly, Applicants respectfully submit that claims 11 and 17 (and their respective dependent claims 12-16 and 18-20) are patentable at least for the reasons mentioned for claim 1.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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